

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WINIFRED BLACKLEDGE)	
)	
Plaintiff,)	
)	
vs.)	CASE No.: CV 2:06-CV-321-ID
)	
ALABAMA DEPARTMENT OF)	
MENTAL HEALTH & MENTAL)	
RETARDATION & COMMISSIONER)	
JOHN HOUSTON, in his Official)	
Capacity as Commissioner.)	
)	
Defendants.)	

PLAINTIFF'S AMENDED EXHIBIT LIST

COMES NOW, Plaintiff Winifred Blackledge, who amends her original exhibit list (Dkt. #40) and hereby lists the following exhibits that may be used at the trial of this action:

1. Community Services Organization June 2000
2. Community Services Organization June 2002
3. PQA II 2002 Job Announcement
4. Essential Job Functions PQA II (2002) Position
5. PQA II List of Qualified Candidates September 7, 2002
6. Daphne Rosalis Applicant Evaluation Form
7. Daphne Rosalis Resume and Application Documents
8. PQA II 2002 Interview Assessment Form
9. Winnifred Blackledge PQA II Application

10. Daphne Rosalis PQA II Application
11. PQA II 2002 Announcement to Daphne Rosalis
12. Memorandum 6/16/99 to Susan Stuardi from Kendra Butler
13. October 15, 2001 Letter to Susan Stuardi from Winnifred Blackledge
14. September 18, 2002 Letter to C&D's from Fordyce Mitchell (re: 04 Budget: new positions)
15. Note concerning CSS III Position
16. E-mail from Susan Stuardi to Fordyce Mitchell (12/05/2002)
17. Letter from Susan Stuardi to Levi Harris (12/13/2002) (Re: CSS III Position)
18. Letter from Susan Stuardi to Levi Harris (12/16/2002) (Re: CSS III Position)
19. E-mail from Susan Stuardi to Wilson and Mitchell (01/21/2003)
20. E-mail from Susan Stuardi to Fordyce Mitchell (02/11/2003)
21. Announcement of CSS III Position Blank
22. Announcement of CSS III Position (10/27/2003)
23. Announcement of CSS III Position with new POS#
24. Announcement of CSS III Position with Notes
25. October 28, 2003 Letter to Personnel Office from Winnifred Blackledge (10/28/2003)(Re: CSS III Application)
26. Winnifred Blackledge Application for CSS III position
27. Community Services Specialist III Essential Job Functions
28. CSS III Applicant Evaluation Form
29. CSS III Interview Questions

30. Applicants for CSS III Position listed with sex and race
31. Applicants for CSS III Position With Crossed-Out Names
32. CSS III Interview Panel Scoring Sheet
33. CSS III Position Applicant Assessment Forms
34. Letter to Henry Ervin from Susan Stuardi (12/10/2003)(Re: CSS III Position given to Mickey Groggel)
35. December 15, 2003 Letter To Henry Ervin from Susan Stuardi
36. Letter to Winnifred Blackledge (12/15/2003)(Re; denial of CSS III position)
37. Faxed Letter to Winnifred Blackledge (12/15/2003)(Re; denial of CSS III position)
38. Select Documents from Mickey Groggel Personnel File
39. Mickey Groggel Resume
40. Mickey Groggel Application for CSS III position
41. Kathi Allen Resume
42. Kathi Allen Application for CSS III Position
43. Celestine Chappell Resume
44. Celestine Chappell Application for CSS III Position
45. Melissa Ezell Resume
46. Melissa Ezell Employment Application for CSS II Position
47. Sheritta Williams Resume
48. Sheritta Williams Employment Application for CSS III Position
49. James Packer Resume
50. James Packer Employment Application for CSS II Position

51. Rebecca Ann Aydelette Application for CSS III Position
52. Donna Buckley Application for CSS III Position
53. Tina Nettles Application for CSS III Position
54. Yolanda Thomas Application for CSS III Position
55. Blackledge Performance Appraisal January
56. Blackledge Performance Appraisal January 2002
57. Blackledge Performance Appraisal January 2003
58. Blackledge Performance Appraisal January 2003 (2)
59. Blackledge Performance Appraisal January 2004
60. Blackledge Performance Appraisal December 2004 (36.3)(Corrected Copy)
61. Mickey Groggel Performance Appraisal March 2001
62. Mickey Groggel PreAppraisal March 2002
63. Mickey Groggel Appraisal March 2002
64. Mickey Groggel Appraisal March 2003
65. Mickey Groggel PreAppraisal March 2004
66. Mickey Groggel Performance Appraisal 2004
67. Mickey Groggel PreAppraisal
68. Blackledge Complaint Form (12/15/2003)
69. Letter from Winnifred Blackledge to Susan Stuardi December 16, 2003
70. Procedure for Conducting Job Audits on Exempt Classifications
71. Letter From Blackledge (Re; Job Duties)
72. ADMHMR Response to Complaint (04/05/2004)

- 73. Recommendation for New Desk Audit
- 74. Letters regarding Desk Audit Findings
- 75. Findings of Fact and Order Regarding Desk Audit
- 76. PQA II (2004) Position Job Announcement
- 77. Letter from Susan Stuardi to Mitchell and Ervin (02/20/2004)
- 78: Winnifred Blackledge PQA II (2004) Application
- 79: Mickey Groggel PQA II (2004) Application
- 80: PQA II (2004) Interview Questions
- 81: PQA II (2004) Interview Assessment
- 82: Letter to Mickey Groggel from Henry Ervin; re: Appointment to PQA II Position (4/28/04)
- 83: Blackledge EEOC Charge (06/08/2004)
- 84: Letter from Winnifred Blackledge to Ruby Morris (EEOC) (06/22/2004)
- 85: Letter to Debra Leo from Rebecca Luck (August 23, 2004)
- 86: Letter to Roy Jackson from Rebecca Luck (April 6, 2005)
- 87: Letter to Roy Jackson from Rebecca Luck (May 5, 2005)
- 88: Pre-Determination Interview conducted by Roy L. Jackson (EEOC) with Rebecca J. Luck June 27, 2005
- 89: EEOC Finding of Reasonable Cause
- 90: EEOC Determination signed by Bernice Williams-Kimbrough
- 91: Notices of Right to Sue from Department of Justice
- 92: Select Pages of ADMHMR's Personnel Procedures Manual

- 93: ADMHR's Policy on Selection of Candidates
- 94: EEOC Charges of Discrimination Filed Against ADMHMR
- 95: Defendant's Responses to Plaintiff's First Interrogatories and Requests for Production
- 96: Plaintiff's Backpay Chart
- 97. Any and all documents listed by Defendant and not objected to by Plaintiff.
- 98. Any and all documents or exhibits needed for rebuttal.
- 99. Any and all documents or exhibits needed for impeachment.
- 100. Deposition excerpts in this matter.
- 101. Any demonstrative exhibits used at trial.
- 102. Plaintiff reserves the right to amend or supplement this exhibit list.

Respectfully submitted,

s/ Joshua D. Wilson
Rocco Calamusa, Jr.
Joshua D. Wilson
Attorneys for the Plaintiff

OF COUNSEL

WIGGINS, CHILDS, QUINN & PANTAZIS, LLC
The Kress Building
301 19th Street North
Birmingham, Alabama 35203

CERTIFICATE OF SERVICE

I do hereby certify that on this the 11th day of February, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

TROY KING
ATTORNEY GENERAL

COURTNEY W. TARVER
Deputy Attorney General and General Counsel
State of Alabama Department of
Mental Health and Mental Retardation
RSA Union Building
100 N. Union Street
P.O. Box 301410
Montgomery, Alabama 36130-1410
Phone: (334) 242-3038
Fax: (334) 242-0924

/s/ Joshua D. Wilson
Of Counsel